

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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In re: :  
: Chapter 7  
ORLY GENDER, :  
: Case No.: 19-13895 (JLG)  
Debtor. :  
: :  
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**DECLARATION OF PAUL LABOV, ESQ.**

PAUL LABOV, pursuant to 28 U.S.C. § 1746(2), declares as follows:

1. I am duly admitted to practice law in this State and before this Court. My firm represents Dalia Genger, (a) a creditor in the above-referenced bankruptcy case, (b) the plaintiff in the constructive trust action brought in connection with this case. *See* Adversary Proceeding # 20-01010-jlg, and (c) the plaintiff in an action seeking to determine the discharge and/or dischargeability of the Debtor. *See* Dkt. No. 99. I respectfully submit this declaration in support of the common interest privilege shared by (a) Dalia Genger (“Ms. Genger”), (b) Sagi Genger (“Sagi”), and (c) the Orly Genger 1993 Trust (the “Orly Trust”), and its Trustee, Michael Oldner (“Mr. Oldner”), and their respective affiliated entities and legal counsel.

2. I hereby attest that my firm’s communications with the parties set forth in Paragraph 1 herein, including with their legal counsel, were confidential, were made pursuant to an express understanding that they would remain so, and were in furtherance of the parties’ shared common legal interests.

I hereby declare under penalty of perjury that the foregoing is true and correct.

Dated: July 10, 2020  
New York, New York

/s/ Paul Labov  
PAUL LABOV